

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

KEVIN JOHNSON,

Plaintiff,

v.

Civil Action No. 3:24cv00080-HEH

**VIRGINIA DEPARTMENT OF
CORRECTIONS, *et al.*,**

Defendants.

WITNESS LIST

COME NOW Defendants Virginia Department of Corrections, Chadwick Dotson, A. David Robinson, Beth Cabell, Kemsy Bowles, Kevin McCoy, Matthew Blaha, Brooks Wallace, Officer Smith, Rick White, D. Trent, E. Creech, J. Monihan, and Johnny Hall, by counsel, and identify the following individuals they intend to call as witnesses for purposes of the evidentiary hearing scheduled for November 19-20, 2024:

1. Defendant A. David Robinson
2. Defendant Kevin McCoy
3. Defendant Johnny Hall
4. Assistant Warden Dwayne Turner
5. Unit Manager David Cornett

Defendants further identify the following individuals, who may be called to testify if the need arises:

1. Investigator Madison Kwizera
2. Karen Stapleton

The foregoing disclosures do not encompass individuals who might be called solely for purposes of rebuttal and impeachment. Defendants reserve the right to call any individual identified by Plaintiff as a witness or potential witness, and further reserve the right to amend the foregoing witness list if the need arises.

Respectfully submitted,

VIRGINIA DEPARTMENT OF CORRECTIONS,
et al., Defendants.

/s/

Margaret O'Shea, SAAG, VSB #66611
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(*Counsel for the Named Defendants*)

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will provide notice to Plaintiff's counsel of record.

By: /s/
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